

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>CHAPTER 13</b>
<b>LUCINDA KAY FREEMAN</b>	:	
<b>aka Cindy Kay Freeman</b>	:	<b>CASE NO. 1:15-bk-04271</b>
<b>Debtor</b>	:	
	:	
<b>FIRST TENNESSEE BANK NATIONAL</b>	:	
<b>ASSOCIATION,</b>	:	
<b>Movant</b>	:	
	:	
<b>v.</b>	:	
	:	
<b>LUCINDA KAY FREEMAN</b>	:	
<b>aka Cindy Kay Freeman,</b>	:	
<b>Respondent</b>	:	
	:	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Proof that foreclosure proceedings were initiated or contemplated at the time of the filing of the bankruptcy petition is demanded at trial and this paragraph is therefore denied.
6. Proof of default is demanded at trial and this paragraph is therefore denied pending Debtor's research of payments made.
7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
8. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

9. Admitted that documents may be attached. Denied that Movant has demonstrated cause for relief.

10. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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